

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	C.A. No. 16-122-LPS
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
GROUPON, INC.	)	
	)	
Defendant.	)	

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Paragraph 12 of the Court’s Scheduling Order (D.I. 17), Plaintiff International Business Machines Corporation and Defendant Groupon, Inc., submit this Joint Claim Construction Chart for U.S. Patent Nos. 5,796,967 (“the ’967 patent”), 7,072,849 (“the ’849 patent”), 5,961,601 (“the ’601 patent”), and 7,631,346 (“the ’346 patent”).

The parties’ respective proposals for the **10** terms in dispute, with citations only to the intrinsic evidence in support of their proposed constructions, are set forth in **Exhibit A** hereto. Where the parties have not offered a construction, it is the parties’ position that the term need not be construed and should be given its ordinary meaning.

Attached as **Exhibit A-1** is a copy of the ’967 patent.

Attached as **Exhibits A-2** through **A-13** are excerpts from the ’967 patent prosecution history and the U.S. Patent Application 07/388,156 prosecution history referred to in the parties’ citations.

Attached as **Exhibit B-1** is a copy of the ’849 patent.

Attached as **Exhibit B-2** through **B-19** are excerpts from the ’849 patent prosecution history referred to in the parties’ citations.

Attached as **Exhibit C-1** is a copy of the ’601 patent.

Attached as **Exhibit C-2** through **C-4** are excerpts from the '601 patent prosecution history and IPR2016-00604 referred to in the parties' citations.

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